

**APPENDIX.**

**The Appropriate Sections of the Revenue Act.**

Section 302(c) of the Revenue Act of 1926 provided in part:

"The value of the gross estate of the decedent shall be determined by including the value at the time of his death of all property, real or personal, tangible or intangible, wherever situated— \* \* \*

"To the extent of any interest therein of which the decedent has at any time made a transfer, by trust or otherwise, in contemplation of or intended to take effect in possession or enjoyment at or after his death \* \* \*."

The joint resolution of Congress of March 3, 1931, U.S.C.A. Internal Revenue Code, Sect. 811c read (C.C.H. Federal Estate Tax, Sec. 3415)

"Resolved by the Senate and House of Representatives of the United States of America in Congress assembled, That the first sentence of subdivision (c) of Section 302 of the Revenue Act of 1926 is amended to read as follows:

"“(c) To the extent of any interest therein of which the decedent has at any time made a transfer, by trust or otherwise, in contemplation of or intended to take effect in possession or enjoyment at or after his death, including a transfer under which the transferor has retained for his life or any period not ending before his death (1) the possession or enjoyment of, or the income from, the property or (2) the right to designate the persons who shall possess or enjoy the property or the income therefrom \* \* \*.”"

The Revenue Act of 1932, 26 U.S.C.A. Internal Revenue Code, Sect. 811c reads: (C.C.H. Federal Estate Tax, Sec. 3416)

"The value of the gross estate of the decedent shall be determined by including the value at the time of his death of all property, real or personal, tangible or intangible, wherever situated—

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"(c) To the extent of any interest therein of which the decedent has at any time made a transfer, by trust or otherwise, in contemplation of or intended to take effect in possession or enjoyment at or after his death, or of which he has at any time made a transfer, by trust or otherwise, under which he has retained for his life or for any period not ascertainable without reference to his death or for any period which does not in fact end before his death (1) the possession or enjoyment of, or the right to the income from, the property, or (2) the right, either alone or in conjunction with any person, to designate the persons who shall possess or enjoy the property or the income therefrom. \* \* \*."

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